

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Creation of a Low  
Power Radio Service

MM Docket No. 99-25

RM-9208  
RM-9242

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**Comments of  
Trumper Communications-Albuquerque (KZRR-FM, KLSK-FM, KTEG-  
FM, KPEK-FM, KZSS-AM, KSYU-AM)**

My name is Milt McConnell, and I am the Vice President and General Manager of the aforementioned radio stations in Albuquerque, New Mexico. Additionally, I am the President of the Albuquerque Broadcasters Association and am a Board member of the New Mexico Broadcasters Association.

I am writing to formally oppose the creation of a Low Power Radio Service. My main concern is the fact that the Federal Communications Commission would have to eliminate, or alter significantly, the interference protection FM broadcasters currently enjoy. At the same time, this idea could hurt our transition to digital broadcasting by eliminating the second-adjacent channel spacing restrictions currently in place.

As a broadcaster since 1970, I believe it prudent that the Commission should first determine what is necessary for development of the In-Band, On-Channel radio service. We would not want our transition to the digital world curtailed by the elimination of the current protection standards which IBOC proponents have used to develop their systems.

Further I would also argue the fact that the Commission has taken over two years to silence pirate operators in Portales and Socorro, New Mexico. With the significant cutbacks in the field offices, it doesn't seem logical that there would be sufficient resources to be able to police thousands of new radio stations.

As the Commission is aware, the Docket 80-90 created thousands of new stations such as the proposal before us. History shows that we need real broadcasters who have a desire and ability to provide real service elements to their respective communities. The proposal of Low Power FM will not result in the desired creation of new minority and female ownership but rather will

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put a significant dent in the ability of New Mexico Broadcasters in rural communities to provide the community news and public service now in place.

It has been suggested that 13,000 comments received by the Commission is driving this effort. May I suggest that the nearly \$20 million dollars in public service provided in 1998 by the New Mexico Broadcasters would be impacted negatively if this proposal is enacted. Which is a greater loss?

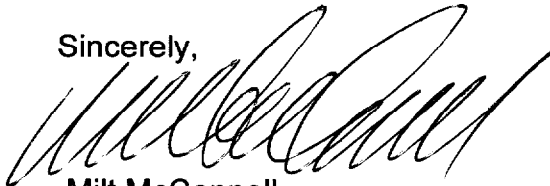
While the Commission has stated that they don't want to hear about the economic impact, the simple fact of the matter is that the economic viability of Albuquerque radio correlates to the ability of broadcasters to provide services. With potentially 36 new stations, (as announced by Commissioner Gloria Tristani before the New Mexico Broadcasters Association Friday April 30, 1999), there would be nearly double the amount of signals in our metro area. A recent survey of our members indicates that such a result would translate in the cancellation of several information services the community now takes for granted.

Even if many minorities and church groups were able to have these stations, there are simply not enough of the new frequencies available for everyone who may want one. And there is no guarantee that minorities and females would want or receive a license.

In Albuquerque as a result of consolidation, there are more live talk programs, more talk programming that is local, and more diversification of programming than existed prior to the passing of the Telecommunications Act of 1996. For example, the formats that did not exist before consolidation include two new talk stations, a children's formatted station, and four additional Hispanic stations. We would still have many simulcast stations and many stations duplicating programming if it weren't for consolidation.

Finally I agree in principle with the Commission that there should be voice for minorities and women. The place for such opportunity is the Internet, not Low Power FM spectrum. There is a place on the Internet for everyone to set up their own broadcast of their specific interests. After seeing all of the imposters resulting from the Docket 80-90, there clearly is no place for inexperienced broadcasters in today's competitive media landscape. The idea is good, but the execution of LPFM will not result in the desired effect.

Sincerely,

A handwritten signature in black ink, appearing to read 'Milt McConnell', written over a horizontal line.

Milt McConnell  
VP/General Manager  
Trumper Communications

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